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November 18, 2011

Hon. Magistrate Ramon E. Reyes, Jr.
U.S. District Court
Eastern District of New York
225 Cadman Plaza East
Brooklyn, N.Y. 11201

Via ECF

Re: In re American Express Anti-Steering Rules Antitrust Litig. (No. II)

Dear Judge Reyes:

The Individual Merchant Plaintiffs ("Merchant Plaintiffs") request an enlargement of time until Monday, November 28th by 5 p.m. eastern to respond to Defendant American Express's motion for a preservation order regarding transactional database materials (docket number 98).

We are authorized by Amex's counsel to inform the Court that Amex takes no position regarding this motion for an enlargement of time.

While we will save our opposition on the merits to Amex's motion for our reply, we will need more than the 3 business days afforded by the default briefing schedule to marshal the information necessary to oppose Amex's motion. Next week is the Thanksgiving holiday which further handicaps our ability to collect information as many people are out on holiday. We have compressed the time we need to respond to what we regard as the bare minimum, which is why we seek the enlargement until November 28th. We certify to the Court that we seek this relief in good faith and not for purposes of delay.

Respectfully submitted,

William J. Blechman
For the Merchant Plaintiffs

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